

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

ABHIJIT DAS

No. 21-cr-10200-RGS

ASSENTED-TO MOTION TO STAY SELF-SURRENDER

Defendant Abhijit Das, with the assent of the government, respectfully requests to stay his self-surrender (currently set for May 30, 2025) pending disposition of the separate case against Mr. Das now pending before Judge Angel Kelley, No. 1:23-cr-10160 (“the Second Case”).

As grounds for this motion, undersigned counsel state:

1. At the sentencing hearing in this case, the Court had indicated it would evaluate a request for a stay of surrender pending appeal once the Court has a “chance to read what the substance of the appeal is and what the Government has to say in response.” 7/18/24 Tr. at 24.
2. In light of the First Circuit briefing schedule, undersigned counsel had planned to proffer a substantive preview of appellate arguments to this Court around the present time, at which point undersigned counsel expected to move for release pending completion of the appeal, which the government likely would have opposed.
3. Meanwhile, however, the government has learned that the Bureau of Prison will not designate Mr. Das to a facility to serve his sentence in this case until the Second Case is completed or close to completed. In light of that information, the government does not oppose a stay of his surrender pending disposition of the Second Case.

4. This agreed-upon stay of surrender is in the interest of judicial economy because it will render unnecessary the briefing of a contested motion for release pending appeal at this time.

5. Continued release will also facilitate trial preparation by counsel for Mr. Das in the Second Case.

6. As noted above, the government assents to the requested relief.

WHEREFORE, Defendant Abhijit Das respectfully requests that the Court stay his surrender to begin serving his sentence in this case pending the disposition of the Second Case.

Respectfully submitted,

ABHIJIT DAS

by his attorneys,

/s/ William Fick
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Certificate of Service

I hereby certify that this document and any attachments filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on May 26, 2025.

/s/ William W. Fick